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February 28, 2022

By ECF

Hon. Lois Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Luz Texidor v. Tromberg, Morris, & Poulin, PLLC* et al.
Civil Action No: 21-cv-4845 (KPK) (LB)

Dear Judge Bloom:

I am a member of Corey Stark PLLC, attorneys for defendant ABC Process Serving Bureau, Inc. (“ABC Service”). I write to request an extension of today’s deadline to respond to Plaintiff’s complaint. This is the second request to extend this deadline.

The primary reason that an extension is necessary is that ABC Service is still exploring whether it has insurance coverage for this claim, and I do not wish to take any action that might serve as a basis for the insurer to disclaim coverage. Accordingly, I request a two-week extension, to which I have obtained the consent of Plaintiff’s counsel and the attorney for co-defendant Tromberg, Morris, & Poulin, PLLC.

The parties also request that the Initial Scheduling Conference set for March 9, 2022, be adjourned to March 28, 2022, March 29, 2022, or March 30, 2022.

Respectfully,

COREY STARK PLLC

/s/

Corey Stark

cc: Emma Caterine, Esq. (*by ECF*)
Arthur Sanders, Esq. (*by ECF*)